

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:
Richard D. Dettinger et al.

Serial No.: 10/821,149

Confirmation No.: 9495

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Filed: April 8, 2004

Group Art Unit: 2164

Examiner: Jacob F. Betit

For: METHOD OF MANAGING AND PROVIDING PARAMETERIZED QUERIES

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

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December 26, 2007

Date

/John C. Garza/

John C. Garza

Dear Sir:

APPEAL BRIEF

Applicants submit this Appeal Brief to the Board of Patent Appeals and Interferences on appeal from the decision of the Examiner of Group Art Unit 2164 October 18, 2007, finally rejecting claims 1-7, 12-16 and 22-26. The final rejection of claims 1-7, 12-16 and 22-26 is appealed. This Appeal Brief is believed to be timely since it is transmitted by the due date of January 1, 2008, as set by the filing of a Notice of Appeal on November 1, 2007.

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Real Party in Interest

The present application has been assigned to International Business Machines Corporation, Armonk, New York.

Related Appeals and Interferences

Applicant asserts that no other appeals or interferences are known to the Applicant, the Applicant's legal representative, or assignee which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

Status of Claims

Claims 1-7, 12-16 and 22-26 are pending in the application. Claims 1-26 were originally presented in the application. Claims 8-11 and 17-21 have been cancelled without prejudice. Claims 1-7, 12-16 and 22-26 stand finally rejected as discussed below. The final rejections of claims 1-7, 12-16 and 22-26 are appealed. The pending claims are shown in the attached Claims Appendix.

Status of Amendments

All claim amendments have been entered by the Examiner, including amendments to the claims proposed after the final rejection.

Summary of Claimed Subject Matter

Claimed embodiments include search systems (see claims 1-6), methods (see claims 7 and 12-15), a computer program stored on computer readable storage media (see claim 16), and data processing systems (see claims 22-26) directed to the management and use of parameterized queries. More specifically, methods, systems and articles of manufacture for managing parameterized queries and making them available to users based on associations between parameterized queries and fields belonging to result sets are provided. By associating fields with parameterized queries, a query manager can be configured to provide users with a contextually appropriate selection of parameterized queries that can be used to obtain data related to objects in a result set. The selection of parameterized queries may be provided to users via a variety of interfaces including graphic interfaces and plug-in components utilized by external applications. See *Application*, page 6, lines 2-25; *Abstract*. For a description of the physical environment of the invention, see *Application*, p. 6-10, for a description of the software environment of the invention, see *Application*, p. 10-11, for a description of methods for providing users with parameterized queries based on the result set, see *Application*, p. 10-12, and for a description of graphic interfaces utilizing the invention, see *Application*, p. 12-18.

A. CLAIM 1 - INDEPENDENT

A search system for gathering detailed information about objects of interest. See *Application*, page 3, line 18 – page 4, line 2. As claimed, the search system includes an interface for presenting a user with a results set received in response to issuing an original executable query, wherein the results set contains a field with one or more values representing objects of interest. See *Application*, page 15, line 7 – page 17, line 17; FIG. 5A. The search system also includes a set of parameterized queries, each having one or more conditions containing at least one parameter marker for which a value may be substituted to generate an executable query. See *Application*, page 12, line 23 – page 14, line 16; FIG. 1; FIG. 4A. The search system also includes a set of parameterized query associations, each specifying one or more fields involved in

conditions having parameter markers contained in a corresponding parameterized query in the set of parameterized queries. See *Application*, page 12, line 23 – page 17, line 28; FIG. 1; FIG. 4A-4B; FIG. 5A-5E. The search system also includes an executable component configured to identify one or more of the parameterized queries only if each field, specified as required in one or more parameterized query associations corresponding to the identified parameterized queries, are contained in the result set. See *Application*, page 10, line 16 - page 12, line 21; FIG. 2A-2B; FIG. 3.

B. CLAIM 7 - INDEPENDENT

A method for automatically presenting a user with parameterized queries, each having parameter markers for which parameter values may be substituted to generate executable queries. See *Application*, page 3, line 18 – page 4, line 2. As claimed, the method includes providing an interface presenting the user with a results set comprising a plurality of fields. See *Application*, page 15, line 7 – page 17, line 17; FIG. 5A. The method also includes identifying one or more parameterized queries on the basis of an association between the one or more of the plurality of fields in the results set and the identified one or more parameterized queries. See *Application*, page 12, line 23 – page 14, line 16; FIG. 1; FIG. 4A. The step of identifying one or more parameterized queries comprises comparing fields in the results set to one or more fields specified as required in a set of parameterized query associations, each corresponding to a parameterized query, and identifying a parameterized query only if each field, specified as required in a parameterized query association corresponding to the identified parameterized query, are contained in the result set. See *Application*, page 10, line 16 - page 12, line 21; FIG. 2A-2B; FIG. 3. The method also includes providing the user access to the identified parameterized queries from the interface. See *Application*, page 12, line 23 – page 17, line 28; FIG. 4A-4B; FIG. 5A-5E.

C. CLAIM 12 - INDEPENDENT

A method for providing a user with access to parameterized queries, each having parameter markers for which parameter values may be substituted to generate executable queries. See *Application*, page 3, line 18 – page 4, line 2. As claimed, the

method includes associating one or more fields with one or more parameterized queries containing parameter markers in conditions containing the one or more fields. See *Application*, page 12, line 23 - page 15, line 18; FIG. 4A-4B. The method also includes analyzing a results set presented to identify parameterized queries associated with fields contained therein. See *Application*, page 15, line 20 - page 18, line 5; FIG. 5A-5E. The method also includes presenting a user with a list of one or more identified parameterized queries. See *Application*, page 15, line 20 - page 18, line 5; FIG. 5A-5E. The method also includes generating an executable query by substituting, for one or more parameter markers in at least one of the identified parameterized queries, one or more values from the results set. See *Application*, page 12, line 13 - page 12, line 21; FIG. 3.

D. CLAIM 16 - INDEPENDENT

A computer-readable storage medium containing a program for providing a user with access to parameterized queries having parameter markers for which parameter values may be substituted to generate executable queries which, when executed by a processor, performs an operation. See *Application*, page 5, lines 3-14. As claimed, the operation includes providing an interface presenting the user with a results set comprising a plurality of fields. See *Application*, page 15, line 7 - page 17, line 17; FIG. 5A. The operation also includes identifying one or more parameterized queries, each associated with one or more of the plurality of fields in the results set. See *Application*, page 12, line 23 - page 14, line 16; FIG. 1; FIG. 4A. The operation also includes providing the user access to the identified parameterized queries from the interface. See *Application*, page 12, line 23 - page 15, line 2; FIG. 4A-4B. The operation also includes providing an interface allowing a user to associate parameterized queries with fields, wherein the interface allows the user to specify one or more fields that are required to be contained in the results set before a corresponding parameterized query is presented to the user. See *Application*, page 15, line 3 - page 17, line 28; FIG. 5A-5E.

E. CLAIM 22 - INDEPENDENT

A data processing system comprising a processor, computer-readable storage media, and an executable component . See *Application*, page 6, line 27 – page 10, line 14; FIG. 1. As claimed, the computer-readable storage media includes a plurality of parameterized queries, each including at least one condition involving at least one parameter marker for which parameter values may be substituted to generate an executable query. See *Application*, page 12, line 23 – page 14, line 16; FIG. 1; FIG. 4A. The computer-readable storage media also includes a set of parameterized query associations, each specifying one or more fields associated with one of the parameterized queries. See *Application*, page 12, line 23 – page 17, line 28; FIG. 1; FIG. 4A-4B; FIG. 5A-5E. As claimed, the natural language component, when executed by the processor, is configured to examine a results set obtained in response to issuing a first query, examine the set of parameterized query associations to identify parameterized queries associated with fields in the results set, and provide an indication of the identified parameterized queries to a user. See *Application*, page 10, line 16 - page 12, line 21; FIG. 2A-2B; FIG. 3.

Grounds of Rejection to be Reviewed on Appeal

1. Rejection of claims 1-26 under 35 U.S.C. 102(e) as being anticipated by *Yuknewicz et al.* (U.S. patent application publication No. 2005/0171934 A1, hereinafter *Yuknewicz*).

ARGUMENTS

1. Claims 1-26 are not anticipated by Yuknewicz under 35 U.S.C. § 102(e).

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Applicants respectfully submit that, in this case, *Yuknewicz* does not disclose "each and every element as set forth in the claim". For example, *Yuknewicz* does not disclose "identify one or more of the parameterized queries only if each field, specified as required in one or more parameterized query associations corresponding to the identified parameterized queries, are contained in the result set." as recited in claim 1. Independent claims 7, 16 and 22 include similar limitations.

Regarding this element, the Examiner argues in *Final Office Action*, p.10:

Yuknewicz teaches selecting a parameterized query by selecting the query from a drop down menu. The drop down menu allows the user to select the query based on the input field the user would like to search the database with. For example the user selects from the drop down menu "Fill by Zip Code". The user is then given a parameterized query that allows entry of a Zip Code. When the query is executed the "Zip Code field is part of the "result set" (see figure 7). Therefore *Yuknewicz* does teach identifying the query based on a one or more field found in the result set.

Here, the Examiner argues that a user making a query selection from a menu is analogous to the recited element. Specifically, the Examiner argues that the user

selection of the query "Fill by Zip Code" from a menu teaches *identifying one or more of the parameterized queries*. Further, the Examiner argues that, since "the Zip Code field is part of the 'result set,'" this teaches the requirement that the identification takes place only if fields associated to the queries are contained in a result set. In *Advisory Action*, p. 3, the Examiner provides further detail, stating:

For instance, if a user wants to search for all records containing the Zip Code 00001; the user selects from the drop down list "Fill by Zip Code"; the user then puts in "00001" in the Zip Code query, which specifies as required a Zip Code field and that it contains 00001. Therefore, all results will have a Zip Code field, and the field will contain the value 00001.

Applicants respectfully submit that the Examiner's analogy is flawed. According to this analogy, the "result set" is the output of the identified parameterized query itself. In contrast, as recited in the present claims, it is clear that the result set is not the output of the identified parameterized query itself, but rather is a separate result set. More specifically, claim 1 recites *a results set received in response to issuing an original executable query*. Claim 22 recites *a results set obtained in response to issuing a first query*. Further, the limitations of claims 7, 12 and 16 make clear that the results set used to identify parameterized queries is not the output of the identified parameterized query itself.

Applicants respectfully submit that *Yuknewicz* does not disclose "each and every element as set forth in the claim". In particular, *Yuknewicz* does not disclose *"identify one or more of the parameterized queries only if each field, specified as required in one or more parameterized query associations corresponding to the identified parameterized queries, are contained in the result set."* Thus, independent claims 1, 7, 12, 16, and 22, are not anticipated.

Therefore, independent claims 1, 7, 12, 16, and 22, and their dependents, are believed to be allowable, and allowance of the claims is respectfully requested.

CONCLUSION

The Examiner errs in finding that claims 1-26 are anticipated by *Yuknewicz* under 35 U.S.C. 102(e).

Withdrawal of the rejections and allowance of all claims is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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CLAIMS APPENDIX

1. (Previously Presented) A search system for gathering detailed information about objects of interest, comprising:
 - an interface for presenting, to a user, a results set received in response to issuing an original executable query, wherein the results set contains a field with one or more values representing objects of interest;
 - a set of parameterized queries, each having one or more conditions containing at least one parameter marker for which a value may be substituted to generate an executable query;
 - a set of parameterized query associations, each specifying one or more fields involved in conditions having parameter markers contained in a corresponding parameterized query in the set of parameterized queries; and
 - an executable component configured to identify one or more of the parameterized queries only if each field, specified as required in one or more parameterized query associations corresponding to the identified parameterized queries, are contained in the result set.
2. (Original) The search system of claim 1, wherein the executable component is configured to present the user with one or more links to the identified parameterized queries from within the interface.
3. (Original) The search system of claim 2, wherein the executable component is configured to provide a parameterized query interface displaying at least one of the identified parameterized queries, in response to the user selecting one of the links.
4. (Original) The search system of claim 3, wherein the executable component is configured to substitute, for at least a first parameter marker contained in the at least one of the identified parameterized queries, at least one value contained in the results set.

5. (Original) The search system of claim 4, wherein the parameterized query interface prompts the user to provide a value to be substituted for at least a second parameter marker contained in the at least one of the identified parameterized queries.

6. (Original) The search system of claim 2, wherein, in response to the user selecting one of the links, the executable component is configured to automatically generate an executable query by substituting, for at least one parameter marker contained in a parameter marker associated with the selected link, at least one value from the results set.

7. (Previously Presented) A method for automatically presenting a user with parameterized queries, each having parameter markers for which parameter values may be substituted to generate executable queries, comprising:

providing an interface presenting the user with a results set comprising a plurality of fields;

identifying one or more parameterized queries on the basis of an association between the one or more of the plurality of fields in the results set and the identified one or more parameterized queries, comprising

comparing fields in the results set to one or more fields specified as required in a set of parameterized query associations, each corresponding to a parameterized query; and

identifying a parameterized query only if each field, specified as required in a parameterized query association corresponding to the identified parameterized query, are contained in the result set; and
providing the user access to the identified parameterized queries from the interface.

8. (Canceled)

9. (Canceled)

10. (Canceled)
11. (Canceled)
12. (Original) A method for providing a user with access to parameterized queries, each having parameter markers for which parameter values may be substituted to generate executable queries, comprising:
- associating one or more fields with one or more parameterized queries containing parameter markers in conditions containing the one or more fields;
 - analyzing a results set presented to identify parameterized queries associated with fields contained therein;
 - presenting a user with a list of one or more identified parameterized queries; and
 - generating an executable query by substituting, for one or more parameter markers in at least one of the identified parameterized queries, one or more values from the results set.
13. (Original) The method of claim 12, further comprising prompting the user for values to be substituted for parameter markers associated with fields not contained in the result set.
14. (Original) The method of claim 12, wherein associating one or more fields with one or more parameterized queries containing parameter markers in conditions containing the one or more fields comprises:
- specifying which fields contained in conditions having parameter markers are required to be contained in the results set before a corresponding parameterized query is presented to the user.
15. (Original) The method of claim 12, wherein:
- presenting a user with a list of one or more identified parameterized queries comprises presenting the user with a list of more than one parameterized query; and

the method further comprises receiving a user selected one of the parameterized queries, wherein the new query is generated by substituting, for one or more parameter markers in the selected parameterized query, one or more values from the results set.

16. (Previously Presented) A computer-readable storage medium containing a program for providing a user with access to parameterized queries having parameter markers for which parameter values may be substituted to generate executable queries which, when executed by a processor, performs operations comprising:

providing an interface presenting the user with a results set comprising a plurality of fields;

identifying one or more parameterized queries, each associated with one or more of the plurality of fields in the results set;

providing the user access to the identified parameterized queries from the interface; and

providing an interface allowing a user to associate parameterized queries with fields, wherein the interface allows the user to specify one or more fields that are required to be contained in the results set before a corresponding parameterized query is presented to the user.

17. (Canceled)

18. (Canceled)

19. (Canceled)

20. (Canceled)

21. (Canceled)

22. (Previously Presented) A data processing system, comprising:
a processor;

one or more computer-readable storage media containing:

(i) a plurality of parameterized queries, each including at least one condition involving at least one parameter marker for which parameter values may be substituted to generate an executable query; and

(ii) a set of parameterized query associations, each specifying one or more fields associated with one of the parameterized queries; and
an executable component which, when executed by the processor, is configured to examine a results set obtained in response to issuing a first query, examine the set of parameterized query associations to identify parameterized queries associated with fields in the results set, and provide an indication of the identified parameterized queries to a user.

23. (Original) The data processing system of claim 22, wherein the executable component is further configured to generate a second query by substituting values contained in the results set for one or more parameters for one of the identified parameterized queries.

24. (Original) The data processing system of claim 22, wherein the executable component is configured to:
provide a first interface to display the results set to a user; and
provide one or more links from within the first interface to a second interface indicating the identified parameterized queries.

25. (Original) The data processing system of claim 22, wherein the executable component is configured to generate a second query by substituting values contained in the results set for one or more parameters for one of the identified parameterized queries selected by the user.

26. (Original) The data processing system of claim 25, wherein the executable component is further configured to prompt the user for data to be substituted for one or

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more parameters of the selected parameterized query that is not contained in the results set.

EVIDENCE APPENDIX

None.

RELATED PROCEEDINGS APPENDIX

None.